

**Exhibit 4 to CTX Response to Motion to Compel**  
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**From:** Steven Levatino <steven@lpfirm.com>  
**Sent:** Tuesday, September 17, 2024 3:39 PM  
**To:** Dan Richards  
**Cc:** Andrew MacRae; Clark Richards; Albert Carrion; Lee Roberts; Karina Esparza  
**Subject:** RE: 1088-0001 (LCMS)

Dan,

You are correct, I will not re-notice the depositions until the court has ruled on the objections.

As for the pending discovery, I am fine with a 30 day extension going both ways for both LCMS and CTX.

In regards to the Moton for Protective Order, in light of the 2<sup>nd</sup> Motion being filed yesterday are you okay with us making the response to CTX Protective Order October 11?

Thank you.

Sincerely,

Steven Levatino  
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**From:** Dan Richards <drichards@rrsfirm.com>  
**Sent:** Tuesday, September 17, 2024 1:20 PM  
**To:** Steven Levatino <steven@lpfirm.com>  
**Cc:** Andrew MacRae <andrew@macraelaw.co>; Clark Richards <crichards@rrsfirm.com>; Albert Carrion <acarrion@rrsfirm.com>; Lee Roberts <lee@lpfirm.com>; Karina Esparza <kesparza@rrsfirm.com>  
**Subject:** RE: 1088-0001 (LCMS)

Steven,

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For all of this. I am happy to give you the requested 30 additional days on the discovery responses.

Also since the depositions are postponed, the 10 days on the motion for protective order is fine. I assume based on your other correspondence you will not re notice the depositions until we have a ruling on the motion for protective order. I ask in return that you grant me 30 days extension on the discovery propounded to Bannwolf and Christian.

Let me know if we are in agreement.

Thanks  
Dan

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**From:** Steven Levatino <[steven@lpfirm.com](mailto:steven@lpfirm.com)>

**Sent:** Friday, September 13, 2024 3:25 PM

**To:** Dan Richards <[drichards@rrsfirm.com](mailto:drichards@rrsfirm.com)>

**Cc:** Andrew MacRae <[andrew@macraelaw.co](mailto:andrew@macraelaw.co)>; Clark Richards <[crichards@rrsfirm.com](mailto:crichards@rrsfirm.com)>; Albert Carrion <[acarrion@rrsfirm.com](mailto:acarrion@rrsfirm.com)>; Lee Roberts <[lee@lpfirm.com](mailto:lee@lpfirm.com)>; Karina Esparza <[kesparza@rrsfirm.com](mailto:kesparza@rrsfirm.com)>

**Subject:** 1088-0001 (LCMS)

Dan,

I would request the courtesy of a couple of extensions to respond to currently pending matters.

1. On September 3 CTC served the following discovery:
  - a. CTX's First Set of Interrogatories to LCMS, an unincorporated association of Lutheran Congregations;
  - b. CTX's First Request for Production to LCMS, an unincorporated association of Lutheran Congregations;
  - c. CTX First Set of Interrogatories to LCMS; and,
  - d. CTX First Request for Production to LCMS.

Can we have an additional 30 days to respond to the above discovery, making it due on November 3, 2024?

2. In regards to the Motion for Protective Order, can LCMS have 10 extra days to respond making its response deadline October 2, 2024?

Thank you.

Sincerely,

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